ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	DA 93-930
800 Data Base Access Tariffs and the	)	CC Docket No. 93-129
800 Service Management System Tariff	)	

DIRECT CASE OF BELL ATLANTIC

The Bell Atlantic telephone companies[1] present their direct case in support of their 800 data base access tariff and to answer the questions presented in the Designation Order in this proceeding.[2] Bell Atlantic's rates are reasonable and were calculated in a manner consistent with the Commission's Rules and prior orders, and its tariff terms and conditions are clear and reasonable. Bell Atlantic urges the Commission to promptly terminate this investigation without further action.

Issue 1. Bell Atlantic's 800 data base access tariff clearly describes the services offered.

Bell Atlantic believes that its tariff clearly describes 800 data base access service and the terms under which it is offered. On the particular issues raised in Designation Order,[3] the tariff clearly indicates that a basic 800 query includes area of service routing at the LATA level and that the query charge is

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[1] The Bell Telephone Company of Pennsylvania, the four Chesapeake and Potomac telephone companies, The Diamond State Telephone Company and New Jersey Bell Telephone Company.

[2] Order Designating Issues for Investigation (rel. July 19, 1993) ("Designation Order").

[3] Designation Order ¶ 6.

imposed only when the call is delivered to the carrier.[4] Bell Atlantic's tariff does not allow it to sell vertical features directly to end users, although it would be in the public interest for the Commission to allow Bell Atlantic to do so.

The Commission asks whether exchange carriers should include RESPORG services in their access tariffs.[5] These order-taking and other administrative functions do not constitute the provision of "communication" under the Communications Act and are, therefore, not subject to the tariffing requirements of section 203. However, if exchange carriers are required to provide these services under tariff, all entities which offer RESPORG services to others for hire should be required to do likewise.

Issue 2. Bell Atlantic used a reasonable method to restructure its baskets while adjusting for exogenous costs.

Bell Atlantic used a variation of Method 1, which is fully described in the attached Appendix A. This methodology resulted in the existing service categories' service band indices ("SBIs") maintaining their same relationships to the upper and lower band limits before and after exogenous cost treatment. Therefore, the Local Switching, Transport and Information service categories were not affected by the 800 data base restructure.

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[4] Section 6.4.3(C) states, "A specific area of service can be a LATA, state, region, USA, or USA/Canada/Caribbean. * * * A basic query charge consists of customer identification . . . , delivery of the dialed 800 ten-digit number, ANI, and the allowable area of service, designated by the customer." (Emphasis added.)

[5] Designation Order ¶ 7.

Bell Atlantic's methodology achieves this objective and is consistent with the Commission's Rules.

Methods 2 and 3 described in the Designation Order are less satisfactory than Method 1.

Method 2 does not address the restructuring of the 800 NXX rates. It is unclear to Bell Atlantic how this method could be used in cases in which an existing rate no longer exists after a restructure. This method would also result in different pricing flexibility between service categories after the restructure. Therefore, this method does not comply with the intent of Price Cap objectives.[6]

Method 3 would not appear to comply with the Commission's Rules. This method states that the SBI upper and lower limits would not be adjusted for the change in the price cap index ("PCI"). Section 61.47, however, requires that the upper and lower limits be adjusted for changes in PCI.

Issue 3. Bell Atlantic's 800 data base access service rates are reasonable.

Bell Atlantic's exogenous costs are reasonable. As required by the Commission's 800 data base rate structure order,[7] the only costs for which Bell Atlantic seeks exogenous treatment are those incurred specifically for the implementation of 800 data

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[6] Method 2 also results in the relationship of SBIs for Local Switching, Transport and Information service categories being different after the restructure even though the rates in these service categories did not change and the exogenous cost was associated only with the 800 data base service category.

[7] 8 FCC Rcd 907, 911 (1993).

base access service. Answers to the questions asked in Appendix A of the Designation Order are contained in Appendix B hereto.

In particular, in order for Bell Atlantic to provide 800 access on the terms prescribed by the Commission, it was necessary for Bell Atlantic to have the SCP upgraded and to install or augment links between its local STPs and the regional STPs. These are costs for which the Commission specifically anticipated exogenous treatment.[8]

In order to provide customers with the same level of service with data base access that they enjoyed with NXX access, it was necessary for Bell Atlantic to establish a specialized 800 repair center, described in Appendix C. As such, the costs of the center were "incurred specifically for the implementation of 800 data base service" and are exogenous under the Commission's prior decisions.

The Commission also questions whether costs are improperly shared between 800 data base and other data base services and between jurisdictions.[9] They are not. For those portions of the network that are shared with other data base services, unit cost was developed using total utilization -- regardless of service. The result is that rates are lower than if costs were borne by only one service. Interstate/intrastate costs are also determined on the basis of demand -- if one category of

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[8] Id.

[9] Designation Order ¶ 27.

demand is larger, it will cause more of the costs and will therefore bear more of the costs.

Bell Atlantic's use of levelized demand was reasonable. Levelized demand is used to bring demand numbers into conformity with how the investments or costs are treated, and it makes an annual number more representative of the five-year study period.

Bell Atlantic could have used its forecast first-year demand for 800 data base access and its investment and actual first-year expenses to calculate its first year rate. This would have resulted in a rate approximately one-third higher than the rate Bell Atlantic filed. If Bell Atlantic had simply used first-year rather than levelized demand to calculate unit cost and exogenous cost, then the higher unit cost coupled with first year demand would have resulted in exogenous costs approximately the same as those in Transmittal No. 560.

The Designation Order requests that Bell Atlantic and other carriers make publicly available the computer models used to apportion common costs to 800 data base access service.[10] This request is a departure from previous Commission decisions protecting from public disclosure similar computer models that contain confidential information of both the exchange carrier itself and the manufacturers that supply the equipment used by the carrier.[11] Bell Atlantic has joined with other users of this model

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[10] Designation Order ¶¶ 28-29.

[11] Commission Requirements for Cost Support Material To Be Filed with Open Network Architecture Access Tariffs, 7 FCC Rcd 521 (Com. Car. Bur. 1991).

in proposing an alternative that satisfies its obligations under Rule 61.49 and gives the Commission all the information it could need in this proceeding, while still protecting the trade secret and other confidential information.[12]

The change in position reflected in the Designation Order seems to be based on a number of incorrect assumptions or findings -- for example, that some exchange carriers developed their rates without using computer models of this sort and that the model in question does not contain proprietary information of entities other than the exchange carriers filing tariffs.[13] All the filing carriers have now made it clear on the record that this is not true,[14] and that there is no basis on which the Commission can distinguish this case from its earlier decisions protecting the information in these models.

Bell Atlantic's demand estimates are reasonable. Estimating demand for a new and growing service is, at best, an inexact science. Bell Atlantic based its forecasts of customer demand for 800 data base access on five-year historical trends for 800 services, on information received from its interexchange carrier customers and on industry reports.[15] Nothing in Bell

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[12] Petition for Waiver, CC 93-129, DA 93-930, at 9-12 (filed Sept. 16, 1993).

[13] Designation Order at 8-9 n.24.

[14] Petition for Waiver; US West Contingent Petition for Waiver, CC 93-129 (filed Sept. 17, 1993).

[15] See Appendix B at 2.

Atlantic's four-month experience with interstate 800 data base access service suggests that these estimates are incorrect.

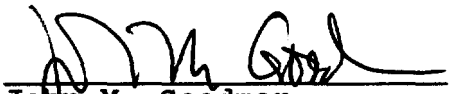
Bell Atlantic's vertical service rates were developed reasonably. The rate for the vertical service package is based on the cost of the basic data base query and represents the additional time it takes to process the more complicated request.

To provide vertical services Bell Atlantic requires additional storage and memory for its SCPs, and it takes longer for the SCP to process a vertical service query than a basic query.[16] Rather, they require more of it to maintain acceptable processing speed and level. The rate for vertical services is designed to recover these costs.

Conclusion

For these reasons, Bell Atlantic urges the Commission to terminate this investigation.

Respectfully submitted,



John M. Goodman

Attorney for the Bell Atlantic
telephone companies

1710 H Street, N.W.
Washington, D.C. 20006
(202) 392-1497

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[16] Designation Order at 9 n.26.

APPENDIX A

APPENDIX A

Restructure Methodology

Step 1 Bell Atlantic restructured its existing 800 NXX rates into the basic query rate and established the 800 Data Base service category. Bell Atlantic summed all of the revenues associated with the 800 NXX rates and moved these revenues into the new 800 Data Base service category.[1]

Step 2 Bell Atlantic restructured (lowered) three rates -- LS_2 Premium, Local Transport Premium Mile Band 1, and Directory Assistance Surcharge Premium -- and increased the basic query rate. These three rates were lowered in the same relationship that the exogenous costs would impact their respective service categories.

Step 3 Bell Atlantic initialized its SBI for 800 Data Base at the API value for the Traffic Sensitive basket.[2]

Step 4 The exogenous cost impact was applied to the Traffic Sensitive Basket. This exogenous cost impact increased the SBI upper and lower limits for the Local Switching, Transport, Information, and 800 Data Base service categories as required by the Commission's Rules.[3]

Step 5 Bell Atlantic then increased its LS_2 Premium, Local Transport Premium Mile Band 1, and Directory Assistance Surcharge Premium rates back to their original amounts before the restructure. Bell Atlantic also increased its 800 Data Base Query rate to reflect the exogenous impact on the 800 Data Base service category. These rate changes increased the SBIs for the respective service categories as well as the API for the Traffic Sensitive basket.

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[1] See Bell Atlantic's Transmittal No. 560 at 2-1 through 2-3 and 4-3 through 4-5. Bell Atlantic explained the method it used to restructure the traffic sensitive basket while adjusting for exogenous costs.

[2] Initializing the 800 Data Base SBI at the Traffic Sensitive API or at 100 has no effect on the basic query rate.

[3] 47 C.F.R. § 61.47.

APPENDIX B

APPENDIX B

Responses to Specific Questions

I. Unit Cost and Investment Information

As directed, unit gross investment has been provided for each function for the relevant Part 32 accounts. This information is contained in Workpaper B-1. Unit investment amounts shown are not adjusted for the Busy Hour Annual Ratio (BHAR). Direct costs are summed in the total column and then multiplied by the BHAR. Bell Atlantic used a composite federal and state/local income tax factor to develop the income tax cost component. These costs are shown on the "Federal Income Tax" cost line.[1]

"SCP/SMS Signalling Links" are long distance circuits purchased by Bell Atlantic from various interexchange carriers. These unit expenses are shown in the "Other Direct Expense" row in the "SCP/SMS Signalling Links" Total column.[2]

All non-plant based expenses, with the exception of the SCP/SMS Signalling Links, were entered in "Other Direct Expense" row of the "RSTP/SCP Signalling Link" Total column. These expenses are 800 trunking, SMS administration, switch translations expenses, billing systems modifications, and repair center costs which support all 800 Data Base Access service functions.[3] The Part 36 categories reflected in the Maintenance, Administration, Other Direct Expense, and Overhead Loadings rows are shown on Workpaper B-2.

II. Jurisdictional Separations

The total company and subject to separations investment amounts shown on Workpaper B-1, page B-2 were calculated by multiplying the unit investment by demand.

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[1] Bell Atlantic used the designation "RSTP-SCP Signalling Link" to better identify that function.

[2] See Bell Atlantic Transmittal No. 560, Description and Justification at 3-2 through 3-3, and Workpapers 5-2 and 5-3. Bell Atlantic described and quantified these other direct expenses in its March 1st filing.

[3] See note 2, supra.

III. Demand

Page B-3 shows intrastate and interstate demand forecast for 800 Data Base Access Service.

IV. Other

1. As shown on page B-3, a discount rate was used to adjust future demand to present day equivalents, and is applied to ensure that demand figures were treated consistently with investment or expense amounts (which are also discounted). 12.9 percent was used because it represents Bell Atlantic's forward-looking estimate for the cost of money. It is developed by weighting the prospective cost of equity and debt for the seven jurisdictions within Bell Atlantic.

2. Bell Atlantic's demand was based both on past performance and assumptions about the impact of number portability on query demand. Therefore, this question is not applicable.

3. Demand was developed using 60 months' worth of historical data of 800 NXX Minutes of Use (MOU). Using regression analysis, an equation was developed to forecast values for the 5-year period of the cost study. Percentage growth rates based on pure regression analysis were then adjusted to reflect market conditions. For example, the first year's forecast was adjusted upwards to reflect expected demand stimulation from the introduction of number portability in the 800 market. However, later years were adjusted downward slightly (1 to 1.5 percentage points) to reflect a tapering off of growth over the course of the study period. The MOUs were then converted to calls (queries) by dividing by an average length of call (2.32 minutes). This call length was based on the most recent data available for 12 months and took into account all areas of Bell Atlantic and properly reflects both long and short duration calls. Each year's number was multiplied by a discount factor to make it equivalent present value.

For the investment, this demand was added to the total utilization of the SCP configuration to determine an investment per query. For non-investment related expenses (e.g. SMS Administration, SCP Technical Support, Repair Center), the total expense amount was divided by the sum of 5 years' discounted demand to determine unit expense.

4. Annual costs associated with 800/SMS are shown on Workpaper B-3. The costs shown include the SCP ports, SCP network validation, and data base administration. Based on its current and expected network configurations, Bell Atlantic determined how many rate elements and quantities would apply. These charges were calculated and then discounted at 12.9%. To get unit expense, the total amount was divided by total discounted demand. The amounts shown

differ slightly from the amounts filed in Transmittal No. 560, Workpaper 5-3, lines 9 through 12 due to changes in the prices between the time the costs were developed and the present. However, the difference is not enough to change the unit cost. The terms of the contracts are generally described at pages 28 through 31 of the SMS/800 direct case.

Additional costs for SCP software support, project maintenance and engineering support from Bellcore are also shown on Workpaper B-3, and match the expenses filed in Transmittal No. 560, Workpaper 5-3, line 21. These amounts were negotiated between Bell Atlantic and Bellcore based on what projects Bell Atlantic is willing to fund. This expense was also divided by total discounted demand.

5. No costs associated with upgrading SSPs were included in Bell Atlantic's basic query rate. Therefore, question 5 is not applicable.

6. Overhead costs were included in Bell Atlantic's initial 800 Data Base Access filing, Transmittal No. 560. This was done because additional investment was required to implement 800 Data Base Access Service, and with any new investment, overhead supporting that investment is required. These overhead costs were included in the exogenous costs because they are expenses directly associated with FCC-mandated implementation of 800 Data Base. The overhead should be borne by the customers of this service, and not by other services within the Traffic Sensitive Switched Basket.

The April 28th Order, allowing the 800 rates to become effective pending investigation, states that price cap carriers recover pre-existing overhead costs through "normal" rates (¶ 17). Implementation of this service and following procedures required by the Commission, however, required extraordinary activities -- the range of which significantly exceeded the overhead costs associated with a typical service, and the costs of such activities are appropriately treated as exogenous.

The success of the national coordination depended upon the efforts on employees of multiple levels and from multiple departments -- product management, access ordering and billing, regulatory, accounting, legal, engineering, and operations. It is these coordination costs that cause an increase in overhead associated with the implementation of 800 Data Base.

The activation of 800 Data Base Access Service was not "normal." Even prior to the September 1991 release of the Commission's Order mandating 800 data base routing, extensive planning and preparation activities were in full swing. For an approximately two-year period, intensive coordination was initiated in order to complete the 800 network configuration. These activities included:

- Travel and lodging expenses for Bell Atlantic employees attending 800 industry fora such as the Carrier Liaison Committee's Ad Hoc 800 Data Base Committee, the 800 Compliance Team, the SCP Owner/Operator's Group, the Operations Billing Forum (OBF) and the Network Operations Forum (NOF). These meetings took place bimonthly and often required the attendance of more than one Bell Atlantic subject matter expert. No other new service turn-up dictated this type of extensive travelling and coordination. Further, while the NOF and OBF handle 800 issues in addition to any other network or billing concerns, the other groups are dedicated to 800 implementation matters. This process involved increased overhead costs specifically attributable to 800 service.

- Training, education and methods development costs will also be incurred at higher than normal levels due to the far-reaching impact of 800 service on Bell Atlantic's operations, i.e., everybody had something to do with it.

- Extended testing activities were necessary: both on an internal, Bell Atlantic basis, and also on an external basis with interexchange carriers and independent local exchange companies operating within Bell Atlantic's region. Links, software patches and equipment upgrades necessitated thorough testing. Further, almost all testing is done in the early morning hours to minimize any disruption; however, such out-of-hours testing necessitates premium pay rates. Network monitoring and analysis were also increased above normal levels to ensure a smooth transition from 800 NXX to 800 data base.

- Additional time and expenses for frequent educational presentations to customers, independent telephone companies, and the staff of the FCC to keep these groups updated on the progress of the transition.

In summary, all of the above activities would generally be recovered through overhead included in normal rate levels. However, due to the national nature of the service, the level and the intensity of the activities required to implement 800 Data Base Access Service, and the deployment deadlines, caused an increase in the overhead typically associated with a new service and which should therefore be recovered in overhead associated with exogenous costs.

7. The signalling links between local STPs and the regional STPs were included as exogenous costs because they are a required part of the 800 Data Base Network configuration. As capacity required, these links were augmented solely for the purpose of 800 Data Base queries, and therefore qualify for exogenous treatment.

8. Costs for a portion of the local STPs and regional STPs are included in Bell Atlantic's exogenous costs. The investment included is that required for queries to be processed and routed to the SCP correctly. Because this investment is used solely for 800 Data Base Access Service, it qualifies for exogenous treatment.

9. At present, Bell Atlantic has four SCPs (two pairs). One pair is dedicated to 800 Data Base Access Service. The other pair is "multi-application" and serves both 800 Data Base Access Service and Billing Validation Service. In 1995, Bell Atlantic plans to change this configuration. At that time, 800 service will be served by two dedicated pairs in the existing location, and an additional pair located elsewhere to provide equipment, vendor, and site diversity. A diagram showing the equipment in a typical SCP installation is attached as Exhibit 1.

10. The costs for the SCP are allocated to the different services that use the equipment. However, Bell Atlantic does not use factors to distribute the cost. The investment is determined on a per query basis -- regardless of service. Investment amounts are calculated in CCSCIS from proprietary vendor data, and the specific network configuration is input into the model. This total investment is then spread out over the entire utilization of the SCP.

INFORMATION REQUEST FOR 800 DATABASE SERVICE EXOGENOUS COSTS

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
BASIC QUERY I. Unit Cost and Investment	Land Acct 2111	Buildings Acct 2121	General Purpose Computers Acct 2124	Analog Switching Acct 2211	Digital Switching Acct 2212	Radio System Acct 2231	Circuit Equipment Acct 2232	Other Terminal Equipment Acct 2362	Poles Acct 2411	Aerial Cable Acct 2421	Underground Cable Acct 2422	Buried Cable Acct 2423	IntraBldg Network Cable Acct 2426	Aerial Wire Acct 2431	Conduit Systems Acct 2441	Total
RSTP/SCP Signalling Link																
Unit Investment	NONE	NONE	NONE	NONE	$1.769524	NONE	$0.038873	NONE	$0.000012	$0.000014	$0.000023	NONE	NONE	NONE	$0.000004	$1.835450
Unit Costs																
Depreciation	NONE	NONE	NONE	NONE	$0.169206	NONE	$0.004637	NONE	$0.000001	$0.000001	$0.000001	NONE	NONE	NONE	$0.000001	$0.178847
Net Return	NONE	NONE	NONE	NONE	$0.216382	NONE	$0.006202	NONE	$0.000001	$0.000001	$0.000002	NONE	NONE	NONE	$0.000000	[illegible]
Federal Income Tax	NONE	NONE	NONE	NONE	$0.109619	NONE	$0.002167	NONE	$0.000001	$0.000001	$0.000001	NONE	NONE	NONE	$0.000000	[illegible]
State & Local Income Tax	NONE	NONE	NONE	NONE	$0.000000	NONE	$0.000000	NONE	$0.000000	$0.000000	$0.000000	NONE	NONE	NONE	$0.000000	$0.000000
Maintenance	NONE	NONE	NONE	NONE	$0.177647	NONE	$0.001828	NONE	$0.000000	$0.000000	$0.000000	NONE	NONE	NONE	$0.000000	$0.179476
Administration	NONE	NONE	NONE	NONE	$0.082746	NONE	$0.001521	NONE	$0.000000	$0.000000	$0.000001	NONE	NONE	NONE	$0.000000	[illegible]
Other Tax	NONE	NONE	NONE	NONE	$0.008401	NONE	$0.000160	NONE	$0.000000	$0.000000	$0.000000	NONE	NONE	NONE	$0.000000	[illegible]
Busy Hour Annual Ratio (BHAR)	NONE	NONE	NONE	NONE	NA	NONE	NA	NONE	NA	NA	NA	NONE	NONE	NONE	NA	0.000582
Cost * BHAR	NONE	NONE	NONE	NONE	NA	NONE	NA	NONE	NA	NA	NA	NONE	NONE	NONE	NA	[illegible]
Other Direct Expense	NONE	NONE	NONE	NONE	NA	NONE	NA	NONE	NA	NA	NA	NONE	NONE	NONE	NA	[illegible]
Overhead Loadings	NONE	NONE	NONE	NONE	NA	NONE	NA	NONE	NA	NA	NA	NONE	NONE	NONE	NA	$0.000222
Total	NONE	NONE	NONE	NONE	$0.763171	NONE	$0.014595	NONE	$0.000003	$0.000003	$0.000005	NONE	NONE	NONE	$0.000001	$0.001210
Local STP/Regional STP Signalling Link																
Unit Investment	NONE	NONE	NONE	NONE	$1.515637	NONE	$0.128918	NONE	$0.000353	$0.002861	$0.008256	$0.001006	NONE	NONE	$0.001693	$1.661684
Unit Costs																
Depreciation	NONE	NONE	NONE	NONE	$0.140582	NONE	$0.015457	NONE	$0.000038	$0.000177	$0.000186	$0.000049	NONE	NONE	$0.000041	$0.156530
Net Return	NONE	NONE	NONE	NONE	$0.176601	NONE	$0.013291	NONE	$0.000040	$0.000301	$0.000334	$0.000107	NONE	NONE	$0.000202	[illegible]
Federal Income Tax	NONE	NONE	NONE	NONE	$0.079487	NONE	$0.005956	NONE	$0.000018	$0.000134	$0.000149	$0.000048	NONE	NONE	$0.000080	[illegible]
State & Local Income Tax	NONE	NONE	NONE	NONE	$0.000000	NONE	$0.000000	NONE	$0.000000	$0.000000	$0.000000	$0.000000	NONE	NONE	$0.000000	$0.000000
Maintenance	NONE	NONE	NONE	NONE	$0.139167	NONE	$0.008012	NONE	[illegible]	[illegible]	$0.000023	$0.000010	NONE	NONE	$0.000018	$0.142171
Administration	NONE	NONE	NONE	NONE	$0.080194	NONE	$0.004349	NONE	$0.000011	$0.000079	$0.000160	$0.000061	NONE	NONE	$0.000092	$0.085708
Other Tax	NONE	NONE	NONE	NONE	$0.010380	NONE	$0.000763	NONE	$0.000002	$0.000018	$0.000016	$0.000005	NONE	NONE	$0.000009	$0.011169
Busy Hour Annual Ratio (BHAR)	NONE	NONE	NONE	NONE	NA	NONE	NA	NONE	NA	NA	NA	NA	NONE	NONE	NA	0.000582
Cost * BHAR	NONE	NONE	NONE	NONE	NA	NONE	NA	NONE	NA	NA	NA	NA	NONE	NONE	NA	[illegible]
Other Direct Expense	NONE	NONE	NONE	NONE	NA	NONE	NA	NONE	NA	NA	NA	NA	NONE	NONE	NA	[illegible]
Overhead Loadings	NONE	NONE	NONE	NONE	NA	NONE	NA	NONE	NA	NA	NA	NA	NONE	NONE	NA	$0.000186
Total	NONE	NONE	NONE	NONE	$0.609457	NONE	$0.043619	NONE	$0.000115	$0.000743	$0.000806	$0.000250	NONE	NONE	$0.000412	$0.000547
SCP/SMS Signalling Link																
Unit Investment	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Unit Costs																
Depreciation	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Net Return	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Federal Income Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State & Local Income Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Maintenance	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Administration	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Other Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Other Direct Expense	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	[illegible]
Overhead Loadings	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Total	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000026
SCP																
Unit Investment	NONE	NONE	NONE	NONE	$3.670100	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$3.670100
Unit Costs																
Depreciation	NONE	NONE	NONE	NONE	$0.343627	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.343627
Net Return	NONE	NONE	NONE	NONE	$0.441983	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.441983
Federal Income Tax	NONE	NONE	NONE	NONE	$0.224346	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.224346
State & Local Income Tax	NONE	NONE	NONE	NONE	$0.000000	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000000
Maintenance	NONE	NONE	NONE	NONE	$0.362913	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.362913
Administration	NONE	NONE	NONE	NONE	$0.169041	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.169041
Other Tax	NONE	NONE	NONE	NONE	$0.017163	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.017163
Busy Hour Annual Ratio (BHAR)	NONE	NONE	NONE	NONE	NA	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	0.000582
Cost * BHAR	NONE	NONE	NONE	NONE	NA	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000001
Other Direct Expense	NONE	NONE	NONE	NONE	NA	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	[illegible]
Overhead Loadings	NONE	NONE	NONE	NONE	NA	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000446
Total	NONE	NONE	NONE	NONE	$1.559075	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.001306
Tandem Switch																
Unit Investment	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Unit Costs																
Depreciation	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Net Return	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Federal Income Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State & Local Income Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Maintenance	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Administration	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Other Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Other Direct Expense	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Overhead Loadings	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Total	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE

BELL ATLANTIC

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
	Land Acct 2111	Buildings Acct 2121	General Purpose Computers Acct 2124	Analog Switching Acct 2211	Digital Switching Acct 2212	Radio System Acct 2231	Circuit Equipment Acct 2232	Other Terminal Equipment Acct 2362	Poles Acct 2411	Aerial Cable Acct 2421	Underground Cable Acct 2422	Buried Cable Acct 2423	IntraBldg Network Cable Acct 2426	Aerial Wire Acct 2431	Conduit Systems Acct 2441	Total
SSP																
Unit Investment	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Unit Costs																
Depreciation	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Net Return	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Federal Income Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State & Local Income Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Maintenance	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Administration	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Other Tax	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Other Direct Expense	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Overhead Loadings	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Total	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE

II. Jurisdictional Separations

RSTP/BCP Signalling Link

Total Investment																
Total Company	NONE	NONE	NONE	NONE	$4,091,192	NONE	$67,227	NONE	$27	$31	$52	NONE	NONE	NONE	$9	$4,118,588
Subject to Separation	NONE	NONE	NONE	NONE	$4,091,192	NONE	$67,227	NONE	$27	$31	$52	NONE	NONE	NONE	$9	$4,118,538
State 800 Database	NONE	NONE	NONE	NONE	$727,147	NONE	$15,734	NONE	$5	$6	$9	NONE	NONE	NONE	$2	$742,999
State Other	NONE	NONE	NONE	NONE	$0	NONE	$0	NONE	$0	$0	$0	NONE	NONE	NONE	$0	$0
Interstate 800 Database	NONE	NONE	NONE	NONE	$3,304,045	NONE	$71,493	NONE	$22	$25	$42	NONE	NONE	NONE	$7	$3,375,635
Interstate Other	NONE	NONE	NONE	NONE	$0	NONE	$0	NONE	$0	$0	$0	NONE	NONE	NONE	$0	$0
Method of Assignment	NONE	NONE	NONE	NONE	CCSCIS	NONE	CCSCIS	NONE	CCSCIS	CCSCIS	CCSCIS	NONE	NONE	NONE	CCSCIS	CCSCIS

Local STP/Regional STP Signalling Link

Total Investment																
Total Company	NONE	NONE	NONE	NONE	$3,401,363	NONE	$264,789	NONE	$792	$6,420	$7,306	NONE	NONE	NONE	$3,799	$3,704,469
Subject to Separation	NONE	NONE	NONE	NONE	$3,401,363	NONE	$264,789	NONE	$792	$6,420	$7,306	NONE	NONE	NONE	$3,799	$3,704,469
State 800 Database	NONE	NONE	NONE	NONE	$613,539	NONE	$51,370	NONE	$143	$1,158	$1,318	NONE	NONE	NONE	$685	$668,213
State Other	NONE	NONE	NONE	NONE	$0	NONE	$0	NONE	$0	$0	$0	NONE	NONE	NONE	$0	$0
Interstate 800 Database	NONE	NONE	NONE	NONE	$2,787,824	NONE	$233,419	NONE	$649	$5,262	$5,988	NONE	NONE	NONE	$3,114	$3,036,256
Interstate Other	NONE	NONE	NONE	NONE	$0	NONE	$0	NONE	$0	$0	$0	NONE	NONE	NONE	$0	$0
Method of Assignment	NONE	NONE	NONE	NONE	CCSCIS	NONE	CCSCIS	NONE	CCSCIS	CCSCIS	CCSCIS	NONE	NONE	NONE	CCSCIS	CCSCIS

SCP/SMS Signalling Link

Total Investment																
Total Company	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Subject to Separation	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State 800 Database	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State Other	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Interstate 800 Database	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Interstate Other	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Method of Assignment	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE

SCP

Total Investment																
Total Company	NONE	NONE	NONE	NONE	$8,235,260	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$8,235,260
Subject to Separation	NONE	NONE	NONE	NONE	$8,235,260	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$8,235,260
State 800 Database	NONE	NONE	NONE	NONE	$1,486,462	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$1,486,462
State Other	NONE	NONE	NONE	NONE	$0	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0
Interstate 800 Database	NONE	NONE	NONE	NONE	$6,748,799	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$6,748,799
Interstate Other	NONE	NONE	NONE	NONE	$0	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0
Method of Assignment	NONE	NONE	NONE	NONE	CCSCIS	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	CCSCIS

BELL ATLANTIC

	A Land Acct 2111	B Buildings Acct 2121	C General Purpose Computers Acct 2124	D Analog Switching Acct 2211	E Digital Switching Acct 2212	F Radio System Acct 2231	G Circuit Equipment Acct 2232	H Other Terminal Equipment Acct 2362	I Poles Acct 2411	J Aerial Cable Acct 2421	K Underground Cable Acct 2422	L Buried Cable Acct 2423	M IntraBldg Network Cable Acct 2426	N Aerial Wire Acct 2431	O Conduit Systems Acct 2441	P Total
Tandem Switch																
Total Investment																
Total Company	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Subject to Separation	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State 800 Database	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State Other	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Interstate 800 Database	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Interstate Other	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Method of Assignment	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
SSP																
Total Investment																
Total Company	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Subject to Separation	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State 800 Database	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
State Other	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Interstate 800 Database	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Interstate Other	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Method of Assignment	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE

III. Demand

	A Total
800 Database Queries	
State 800 Database	733,247,107
State Other	0
Interstate 800 Database	3,331,761,037
Interstate Other	0
Base Period Demand	3,331,761,037
Estimated Demand	4,065,008,144
Time Period	5 years
Discount Rate	12.9%

BELL ATLANTIC
VERTICAL FEATURE PACKAGE

I. Unit Cost and Investment

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
	Land Acct 2111	Buildings Acct 2121	General Purpose Computers Acct 2124	Analog Switching Acct 2211	Digital Switching Acct 2212	Radio System Acct 2231	Circuit Equipment Acct 2232	Other Terminal Equipment Acct 2362	Poles Acct 2411	Aerial Cable Acct 2421	Underground Cable Acct 2422	Buried Cable Acct 2423	IntraBldg Network Cable Acct 2426	Aerial Wire Acct 2431	Conduit Systems Acct 2441	Total
SCP																
Unit Investment	NONE	NONE	NONE	NONE	$0.920290	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.920290
Unit Costs																
Depreciation	NONE	NONE	NONE	NONE	$0.088857	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.088857
Net Return	NONE	NONE	NONE	NONE	$0.110808	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.110808
Federal Income Tax	NONE	NONE	NONE	NONE	$0.058180	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.058180
State & Local Income Tax	NONE	NONE	NONE	NONE	$0.000000	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000000
Maintenance	NONE	NONE	NONE	NONE	$0.080880	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.080880
Administration	NONE	NONE	NONE	NONE	$0.041667	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.041667
Other Tax	NONE	NONE	NONE	NONE	$0.003694	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.003694
Busy Hour Annual Ratio (BHAR)	NONE	NONE	NONE	NONE	NA	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	0.000000
Cost * BHAR	NONE	NONE	NONE	NONE	NA	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000215
Other Direct Expense	NONE	NONE	NONE	NONE	NA	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000000
Overhead Loadings	NONE	NONE	NONE	NONE	NA	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000111
Total	NONE	NONE	NONE	NONE	$0.369496	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0.000327

II. Jurisdictional Separations

SCP

Total Investment																
Total Company	NONE	NONE	NONE	NONE	$819,507	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$819,507
Subject to Separation	NONE	NONE	NONE	NONE	$819,507	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$819,507
State 800 Database	NONE	NONE	NONE	NONE	$111,747	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$111,747
State Other	NONE	NONE	NONE	NONE	$0	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0
Interstate 800 Database	NONE	NONE	NONE	NONE	$507,760	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$507,760
Interstate Other	NONE	NONE	NONE	NONE	$0	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	$0
Method of Assignment	NONE	NONE	NONE	NONE	CCSCIS	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	CCSCIS

III. Demand

	A
	Total
VFP Queries	
State 800 Database	219,974,132
State Other	0
Interstate 800 Database	999,525,311
Interstate Other	0
Base Period Demand	0
Estimated Demand	1,219,502,443
Time Period	5 years
Discount Rate	12.9%

PART 36 CATEGORIES – EXPENSES
800 DATA BASE

	Plant Specific	Plant Non–Specific	Customer Operations	Corporate Operations
MAINTENANCE	X	X		
ADMINISTRATION		X	X	X
OTHER DIRECT EXPENSE				
800 TRUNKING	X			
SMS ADMINISTRATION	X			X
SWITCH TRANSLATION	X			
BILLING SYSTEMS MODS.			X	X
SCP CIRCUITS	X			
REPAIR CENTER		X		
OVERHEADS				
ALL RATE ELEMENTS	X	X	X	X
See Note				

Note: For Overheads, all Part 36 categories of expense have been marked. Bell Atlantic's overhead loading factor is calculated from ARMIS data and does not reflect any one specific Part 36 category or Part 32 account, but instead estimates the Part 69 allocation loadings for a given service.

ANNUAL SMS/800 COSTS

	DSMI RATE ELEMENT	SOURCE	A Monthly Charge	B Quantity: 1993–94	C Quantity: 1995–97	D 1993 Annual Amount	E 1994 Annual Amount	F 1995 Annual Amount	G 1996 Annual Amount	H 1997 Annual Amount	I 5–year PV Total
1	SCP Port Charge	SMS/800	$2,194.57	8	12	$210,679	$210,679	$316,018	$316,018	$316,018	$996,984
2	SCP Network Validation	SMS/800	$5,039.15	1	1	$60,470	$60,470	$60,470	$60,470	$60,470	$226,544
3	Data Base Administration	SMS/800	$10,716.94	4	6	$514,413	$514,413	$771,620	$771,620	$771,620	$2,434,331
4	Annual Costs	L1 + L2 + L3				$785,562	$785,562	$1,148,108	$1,148,108	$1,148,108	$3,657,860
5	Present Value Factor at 12.9 %	Col I, L1 = Col D, L1 * L5 + ... + Col H, L1 * L5 Col I, L2 = Col D, L2 * L5 + ... + Col H, L2 * L5 Col I, L3 = Col D, L3 * L5 + ... + Col H, L3 * L5				0.9411	0.8336	0.7384	0.654	0.5793	
6	Total Expenses	Col I, L4				$3,657,860					
7	Demand	Trans. No. 560 Workpaper 5–6, L6D				14,332,586,371					
8	Annual Unit Expense	L6/L7				$0.000255					

	BELLCORE ITEM	SOURCE	AMOUNT
9	800 Project Management	Bellcore	$258,000
10	Software Development	Bellcore	$230,400
11	Engineering and Maintenance Support	Bellcore	$463,400
12	Total Bellcore Costs	L9 + L10 + L11	$951,800
13	Total Unit Expense	L12/L7	$0.000066

BELL ATLANTIC
800 DATA BASE - SCP CONFIGURATION

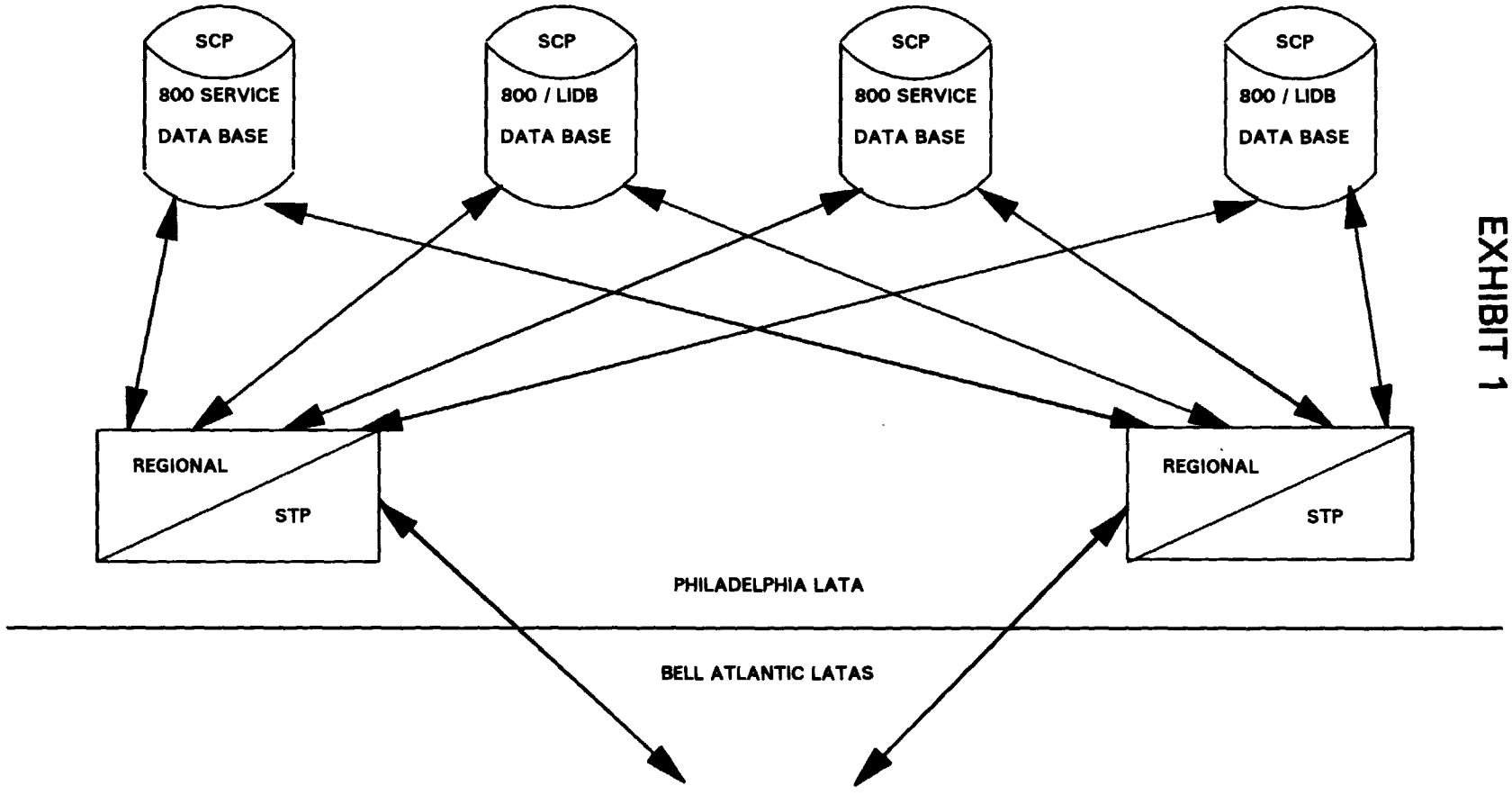

EXHIBIT 1

APPENDIX C

APPENDIX C

Bell Atlantic's 800 Repair Center

It is far more complicated to deal with trouble reports in a database environment than it was with NXX access. Previously, anyone receiving a trouble report could readily identify the interexchange carrier/RESPORG by looking at a list that showed 800 NXX assignments. This is no longer possible. Today, Bell Atlantic personnel require on-line access to the SMS to perform the same functions.

For this reason and because of the increasing importance of 800 services to carriers and end users, Bell Atlantic has established a consolidated repair center to handle 800 access trouble reports in order to resolve customer problems as quickly as possible. The Center will take calls from interexchange carriers to allow them to report troubles experienced anywhere in Bell Atlantic territory. It will also assist other local exchange carriers and end users by helping them to identify the RESPORG for an 800 number that is experiencing problems. These functions are vital to the effective operation of 800 data base access service, and the costs of the Center should not be borne by the general ratepayers.

There was no new investment for the Repair Center. The added expenses were for special software, communications links and personnel to staff the Center.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Direct Case of Bell Atlantic" was served this 20th day of September, 1993, by first class mail, postage prepaid, to the parties on the attached list.

Jaynemarie Lentlie